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**Via ECF**

The Honorable Robert W. Sweet, U.S.D.J.  
 United States District Court  
 Southern District of New York  
 500 Pearl St.  
 New York, NY 10007

May 4, 2018

Re: *Alvarez Cifuentes et al. v. Hamo Inc. et al.*  
Case No. 17-CV-5357

Dear Judge Sweet:

We are counsel to Plaintiffs in the above referenced matter. We respectfully submit this letter to inform the Court of a discovery dispute and move, by the instant letter motion, to compel Defendant Mohammed Elhassani to respond to Plaintiffs' First Set of Interrogatories and Plaintiffs' First Request for Production of Documents, or in the alternative, that the Court address these issues at the Initial Conference currently scheduled for May 8, 2018 at 12 p.m.

5-8-18

On November 8, 2017, Plaintiffs served their discovery requests. Defendant Mohammed Elhassani's responses were due on December 8, 2017. On March 15, 2018, Plaintiffs' counsel contacted Defendant Mohammed Elhassani's counsel to discuss Defendant's outstanding discovery responses. Defendant did not respond. On March 20, 2018, Plaintiffs' counsel contacted Defendant Mohammed Elhassani's counsel again. The parties met and conferred on March 22, 2018. During the call, Defendant Mohammed Elhassani's counsel represented that Mohammed Elhassani is out of the country. As of this date, Defendant Mohammed Elhassani has failed to respond to Plaintiffs' discovery requests.

For the foregoing reasons, Plaintiffs respectfully request that the Court compel Defendant Mohammed Elhassani to respond to Plaintiffs' First Set of Interrogatories and Plaintiffs' First Request for Production of Documents.

We thank Your Honor for considering this matter.

Respectfully submitted,

/s/ C.K. Lee  
 C.K. Lee, Esq.

cc: all parties via ECF

